

THE HONORABLE LAUREN KING

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

LEO'S WELDING and FABRICATION, LLC, a
Washington limited liability company

Plaintiff,

v.

HANNAH, Official Number 1067457, her
machinery, engines, equipment, cargo
appurtenances, *in rem* and SAYAK LOGISTICS,
LLC, a Alaska limited liability company dba
NORTHLINE SEAFOODS *in personam*;

Defendants.

IN ADMIRALTY

NO. 2:25-cv-00625-LK

MOTION TO ISSUE WARRANT FOR
ARREST OF VESSEL

NOTE ON MOTION CALENDAR:
Tuesday, April 29, 2025

Plaintiff Leo's Welding and Fabrication, LLC ("Plaintiff"), by and through counsel of record, in accordance with Rule C(3) of the Supplemental Rules for Admiralty or Maritime Claims and Asset Forfeiture Actions ("Supplemental Admiralty Rules") and Local Admiralty Rule 116, requests that the Court authorize the clerk to issue a Warrant for Arrest of defendant vessel, HANNAH, Official Number 1067457, her machinery, engines, equipment, cargo and

1 appurtenances (“Vessel”). This motion is based upon the information set forth in the Verified
2 Complaint to Enforce Maritime Lien, Breach of Contract, and for Damages *in Rem* and *In*
3 *Personam* filed on April 8, 2025 (“Complaint”).

4 1. Supplemental Admiralty Rules C(1)(a) provides that an action in rem may be brought to
5 enforce a maritime lien. If conditions for an *in rem* action exist, then the court must issue an
6 order directing the clerk to issue a warrant for the arrest of the vessel or other property that is
7 subject to the action. Supplemental Admiralty Rules C(3)(a).

8 2. As set forth in the Complaint, Plaintiff seeks to enforce a maritime lien for machinery and
9 necessities recorded on December 17, 2024. *Compl.* 3.8. The lien is based upon *in personam*
10 defendant Sayak Logistics’ breaching of a contract with plaintiff wherein plaintiff provided
11 various machinery, fabrication, engine room and upper deck piping, and other necessities for the
12 Vessel to operate during the 2024 Bristol Bay commercial salmon season. *Compl.* 2.5.

13 3. All charges under the contract, as set forth in 107 separate invoices, were reasonable, and
14 were provided on the order of Ben Blakey, CEO and member of defendant Sayak Logistics LLC.
15 *Compl.* 3.7.

16 4. 46 U.S. Code § 31342 provides that upon making an adequate showing establishing the
17 existence of a maritime lien under, plaintiff may bring a civil action *in rem* to enforce the lien
18 against the Vessel.

19 5. The Vessel is now located at the Fairhaven Shipyard, 201 Harris Avenue, Bellingham,
20 Washington, which is within this District and subject to the jurisdiction of this Court. *Decl.*
21 *Fowler-proposed custodian* 2.4. When the Verified Complaint was filed the vessel was located
22 at the Bellingham Shipping Terminal, 661 Cornwall Avenue, Bellingham, Washington 98225
23 *Compl.* 2.3.

6. The Vessel is steel construction and has no mechanical propulsion. The Vessel is 379.8 feet in length, 100 feet in breadth, and 21.5 feet in depth. The Vessel has a gross tonnage of 14,128 (ITC) and a net tonnage of 5,119 (ITC). The primary operational endorsements listed on the Certificate of Documentation are Fishery, Registry and Coastwise. The Vessel's International Maritime Organization (IMO) is 294 and Official No. 1067457. The Vessel's hailing port is Dillingham, Alaska. *Compl. 2.4.*

7. Based upon the foregoing, Plaintiff respectfully submits the requirements of Supplemental Rule C (3) have been met and, therefore, this Court should authorize the issuance of a Warrant for Arrest.

DATED 28th day of April 2025.

ZUANICH LAW, PLLC

By: /s/ Brian C. Zuanich
/s/ Robert Zuanich

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